



LAW DEPARTMENT

Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 500
Detroit, Michigan 48226-3437

Phone 313•224•4550
Fax 313•224•5505
www.detroitmi.gov

January 25, 2019

Joan Fiore
Javion & Sam's Towing Service, Inc.
8100 Lynch Road
Detroit, MI 48234

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0042-INV

Dear Ms. Fiore and Ms. Ha:

The Office of the Inspector General ("OIG") issued a debarment against Joan Fiore and Javion & Sam's Towing Service, Inc. ("Javion & Sam's"). The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the "Hearing") within 45 days of the Detroit City Council's receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

The Hearing will be conducted before the Detroit City Council as a whole, in the Committee of the Whole room on the 13th floor of the Coleman A. Young Municipal Center. Either side may use the room's screens and A/V equipment (e.g. to show "PowerPoint" slides), but must submit their content on a USB drive storage device at least one week in advance. At the Hearing, each appellant will be allowed ten (10) minutes to present oral argument to City Council; the OIG will be permitted five (5) minutes to give responsive oral argument. Appellants may combine or exchange time as they choose but must provide notice one week in advance. My office will serve as timekeeper, and the City Council President will be the presiding officer for the Hearing.

Please be advised that the entire City Council has been provided all of your written submissions on appeal, and there is no need to supplement the record. However, if you wish, you may submit a summary – no longer than three (3) pages and consistent with the Filing Standards provided in Michigan Court Rule 1.109 (C)(1), stating your position, at least one week in advance of the Hearing. If you send the summary to me, my office will ensure that the summary is received by all members of Council before the Hearing.

After the Hearing and pursuant to Detroit City Code Sec. 18-11-11, City Council will decide: (1) whether the OIG's debarment decision was based on a preponderance of evidence; and (2) whether the penalty assessed by the OIG is appropriate under the ordinance. The standard of City Council's review in deciding these two matters will be abuse of discretion.

Sincerely,

Lawrence T. García
Detroit Corporation Counsel

cc. Detroit City Council
 David Whitaker (LPD)



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January 25, 2019

David Fraser, Esq,
Holmes Fraser, PLLC
PO Box 263
Saint Clair, MI 48079-6263

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0042-INV

Dear Mr. Fraser and Ms. Ha:

The Office of the Inspector General (“OIG”) issued a debarment against Joan Fiore and Javion & Sam’s Towing Service, Inc. (“Javion & Sam’s”). The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the “Hearing”) within 45 days of the Detroit City Council’s receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

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Sincerely,

Lawrence T. García
Detroit Corporation Counsel

cc. Detroit City Council
 David Whitaker (LPD)



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David Fraser, Esq,
Holmes Fraser, PLLC
PO Box 263
Saint Clair, MI 48079-6263

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0043-INV

Dear Mr. Fraser and Ms. Ha:

The Office of the Inspector General (“OIG”) issued a debarment against Paul Ott, City Wide Towing, Inc. and Gene’s Towing, Inc. (“City Wide” and “Gene’s”). The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the “Hearing”) within 45 days of the Detroit City Council’s receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

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After the Hearing and pursuant to Detroit City Code Sec. 18-11-11, City Council will decide: (1) whether the OIG’s debarment decision was based on a preponderance of evidence; and (2) whether the penalty assessed by the OIG is appropriate under the ordinance. The standard of City Council’s review in deciding these two matters will be abuse of discretion.

Sincerely,

Lawrence T. García
Detroit Corporation Counsel

cc. Detroit City Council
 David Whitaker (LPD)



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January 25, 2019

Anthony Thomas
B&G Towing, LLC
8100 Lynch Road
Saint Clair, MI 48079-6263

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0044-INV

Dear Mr. Thomas and Ms. Ha:

The Office of the Inspector General (“OIG”) issued a debarment against Anthony Thomas and B&G Towing (“B&G”). The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the “Hearing”) within 45 days of the Detroit City Council’s receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

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After the Hearing and pursuant to Detroit City Code Sec. 18-11-11, City Council will decide: (1) whether the OIG’s debarment decision was based on a preponderance of evidence; and (2) whether the penalty assessed by the OIG is appropriate under the ordinance. The standard of City Council’s review in deciding these two matters will be abuse of discretion.

Sincerely,

Lawrence T. García
Detroit Corporation Counsel

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 David Whitaker (LPD)



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January 25, 2019

Joseph J. Shannon, Esq.
Bodman, PLC
6th Floor at Ford Field
1901 St. Antoine Street
Detroit MI 48226

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit, MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0045-INV

Dear Mr. Shannon and Ms. Ha:

The Office of the Inspector General (“OIG”) issued a debarment against Jessica Lucas and Boulevard and Trumbull Towing, Inc. (“B&T”). The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the “Hearing”) within 45 days of the Detroit City Council’s receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

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After the Hearing and pursuant to Detroit City Code Sec. 18-11-11, City Council will decide: (1) whether the OIG’s debarment decision was based on a preponderance of evidence; and (2) whether the penalty assessed by the OIG is appropriate under the ordinance. The standard of City Council’s review in deciding these two matters will be abuse of discretion.

Sincerely,

Lawrence T. García
Detroit Corporation Counsel

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 David Whitaker (LPD)



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January 25, 2019

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Bodman, PLC
6th Floor at Ford Field
1901 St. Antoine Street
Detroit MI 48226

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit, MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0048-INV

Dear Mr. Shannon and Ms. Ha:

The Office of the Inspector General (“OIG”) issued a debarment against Jennifer Fiore. The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the “Hearing”) within 45 days of the Detroit City Council’s receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

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Sincerely,

Lawrence T. García
Detroit Corporation Counsel

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January 25, 2019

Nicholas J. Bachand, Esq.
2411 Vinewood Street
Detroit MI 48216-1062

Ellen Ha
Detroit Inspector General
65 Cadillac Square
Detroit, MI 48226

RE: OIG File Nos. 18-0008-INV and 18-0047-INV

Dear Mr. Bachand and Ms. Ha:

The Office of the Inspector General (“OIG”) issued a debarment against Gasper Fiore. The debarred parties have asserted an appeal of this decision and are entitled to a hearing (the “Hearing”) within 45 days of the Detroit City Council’s receipt of the appeal letter. See Detroit City Code, Section 18-11-11. The City Clerk will provide the official notification of the Hearing date, but my understanding is that it is tentatively scheduled for Tuesday, February 19, 2019 at 1:00 pm.

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Lawrence T. García
Detroit Corporation Counsel

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